

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES, et al.,)
)
)
Plaintiffs,)
) No. 1:23-cv-00108-LMB-JFA
v.)
)
GOOGLE LLC,)
)
Defendant.)

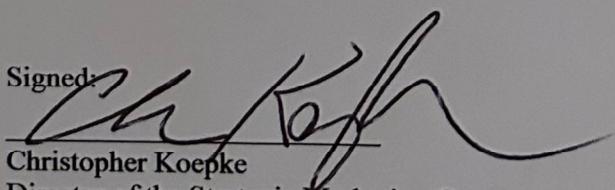
**DECLARATION OF CHRISTOPHER KOEPEK
IN SUPPORT OF PLAINTIFFS' OPPOSITION TO
GOOGLE'S MOTION TO EXCLUDE THE TESTIMONY OF ADORIA LIM**

I, Christopher Koepke, pursuant to 28 U.S.C. § 1746 hereby declares as follows:

1. I am over 21 years old and am competent to testify about the matters in this Declaration based on my personal knowledge.
2. I am the Director of the Strategic Marketing Group in the Office of Communications at the Centers for Medicare and Medicaid Services (“CMS”), and submit this Declaration in support of Plaintiffs’ Opposition to Google’s Motion to Exclude the Testimony of Adoria Lim.
3. In my role as the Director, I oversee Medicare, Medicaid, and health insurance marketplace communication campaigns, strategic planning, and marketing research.
4. The exhibit beginning with CMS-ADS-0001168675 is a true and correct copy of a payment documentation submitted by Weber Shandwick to CMS pursuant to the Weber Shandwick advertising contract.
5. Indirect rates, fixed fees, and labor rates included in this document constitute competitively sensitive information not available to the general public and making them available on the public docket would prejudice CMS’s ability to conduct business.
6. The exhibit beginning with CMS-ADS-0001096610 is a true and correct copy of an excerpt of a Transactions Report output from the CMS Healthcare Integrated General Ledger Accounting System. This document reflects filtering of data specific to “IPG DXTRA, Inc.,” which is Weber Shandwick’s formal name.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 17, 2024.

Signed:


Christopher Koepke
Director of the Strategic Marketing Group
Office of Communications
Centers for Medicare & Medicaid Services (CMS)